

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA**

In re

HARRY MICHAEL ANTHONY,

Debtor.

} Bankruptcy Case No. 08-28564-BM

} CHAPTER 7

FOUR G'S L.P.,

Movant,

} Doc. No. _____

v.

HARRY MICHAEL ANTHONY

Respondent.

CONSENT MOTION TO COMPEL DISCOVERY

Movant, Four G's L.P. ("Four G"), by an through undersigned counsel, files this Consent Motion to Compel Discovery and respectfully states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334.

2. Venue is proper before this Court pursuant to 258 U.S.C. §§ 1408 and 1409.

BACKGROUND

3. Movant, Four G's L.P. ("Four G"), is the landlord of non-residential real property known as 4307 Northern Pike, Monroeville, PA 15146 (the "Leased Premises").

4. Debtor Harry Michael Anthony ("Debtor") filed this instant bankruptcy case on December 29, 2008 and is a Guarantor to a lease for Leased Premises from Four G.

5. There is a dispute between the parties which is set for evidentiary hearing on June 1, 2011.

6. Pursuant to Federal Rules of Civil Procedure and the Bankruptcy Code, Movant issued Interrogatories and Request for Production of Documents ("Discovery") directed to the Debtor on or about February 25, 2011.

7. The deadline for a response to the Discovery was March 28, 2011

8. Despite the numerous requests from Four G's counsel directed to Debtor's counsel, the Debtor has not yet responded to Four G's Interrogatories and Request for Production of Documents.

9. Undersigned counsel for Movant has conferred with Debtor's counsel regarding the lack of a timely response.

10. Debtor's counsel has consented to the entry of an Order of Court compelling the Debtor to respond to the Discovery on or before April 20, 2011.

WHEREFORE, Movant, Four G's L.P., respectfully requests that this Court enter an order compelling Debtor Harry Michael Anthony to answer the Discovery on or before April 20, 2011, and for such other relief as is just and proper.

Dated: April 14, 2011

Respectfully submitted,

/s/ Harry A. Readshaw

Harry A. Readshaw

Pa. I.D. No. 204287

ECKERT SEAMANS CHERIN MELLOTT, LLC

600 Grant Street, 44th Floor

Pittsburgh, PA 15219

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ATTORNEYS FOR FOUR G'S L.P.

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CERTIFICATE OF SERVICE

I hereby certify that on April 14 , 2011, I caused to be served a true and correct copy of the foregoing Motion via First Class U.S. Mail, postage prepaid upon the following:

Scott B. Lang
535 Clairton Blvd.
Pittsburgh, PA 15236

Harry Michael Anthony
6213 Highview Drive
Belle Vernon, PA 15012

Dated: April 14, 2011

/s/ Harry A. Readshaw
Harry A. Readshaw
Pa. I.D. No. 204287
ECKERT SEAMANS CHERIN MELLOTT, LLC
600 Grant Street, 44th Floor
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